

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

IN RE:	:
Keith A Oliver	: Chapter 13
Debtor	: Case No.: 23-13845-PMM

---

**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Keith A Oliver (the “Debtor”), by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. The Debtor filed a Chapter 13 Bankruptcy on or about December 21, 2023 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed by this Honorable Court on or about September 05, 2024.
3. On October 10, 2024, Lakeview Loan Servicing LLC (the “Mortgagee”) filed a Motion for Relief from Stay with respect to the Debtor’s residence. (Docket No. 28)
4. On October 15, 2024, the Debtor filed a response to the Motion for Relief. (Docket No. 30)
5. The Debtor has entered into a stipulation with the Mortgagee to resolve the Motion for Relief which provides for payment of post-petition mortgage arrears in the Debtors’ chapter 13 plan.
6. Accordingly, the Debtor is filing the instant Motion to Modify their chapter 13 plan to provide for payment of the post-petition mortgage arrears.
7. The Debtor has paid \$24,936.21.00 to the Chapter 13 Trustee to date.

8. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$4,055.00 per month for 51 months for a new base amount of \$231,741.21.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan.

Dated: November 15, 2024

/s/Brad J. Sadek, Esq.

Brad J. Sadek, Esq.  
Attorney for Debtor(s)  
Sadek Law Offices, LLC  
1500 JFK Boulevard, Suite #220  
Philadelphia, PA 19102  
[brad@sadeklaw.com](mailto:brad@sadeklaw.com)  
215-545-0008